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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHENGJIE LI,

Plaintiff,

V.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY.

Defendant.

Case No. 3:24-cv-07508 TSH

**STIPULATION TO EXTEND TIME FOR
DEFENDANT'S RESPONSE TO PLAINTIFF'S
COMPLAINT; AND ~~PROPOSED~~ ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time for Defendant's response to Plaintiff's complaint. Defendant will file their response on or before February 3, 2025. The parties make this request because Defendant needs a brief period of additional time to prepare their response.

The parties further request a corresponding extension on the deadline for filing a motion for summary judgment under the Court’s Immigration Mandamus Procedural Order. Dkt. No. 5. Currently, Defendant must file a motion for summary judgment by 120 days after the complaint was served, or March 4, 2025. In view of the agreed-upon extension for Defendant’s response to the complaint, the parties request that Defendant must file their motion for summary judgment by April 3, 2025.

1 Dated: January 3, 2025

Respectfully submitted,¹

2 ISMAIL J. RAMSEY
United States Attorney

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4 /s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
5 Assistant United States Attorney
6 Attorneys for Defendant

7 Dated: January 3, 2025

8 /s/ Kristina David
KRISTINA DAVID
9 David Strashnoy Law, PC
Attorney for Plaintiff

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11
12 **[PROPOSED] ORDER**

13 Pursuant to stipulation, IT IS SO ORDERED.

14 Date: January 3, 2025

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16 THOMAS S. HIXSON
17 United States Magistrate Judge

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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
signatories listed herein concur in the filing of this document.